

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TANGLETOWN, LLC,

Plaintiff,

v.

UNDERWRITERS AT LLOYD'S, LONDON,

Defendant.

NO. C06-0846 JCC

**STIPULATED MOTION TO EXTEND
DEFENDANT UNDERWRITERS AT
LLOYD'S LONDON'S DEADLINE TO
RESPOND TO PLAINTIFF
TANGLETOWN LLC'S MOTION TO
COMPEL**

**NOTE ON MOTION CALENDAR:
February 12, 2007**

I. INTRODUCTION/RELIEF REQUESTED

COME NOW the parties and hereby stipulate to an Order extending the deadline for Defendant Underwriters at Lloyd's, London ("Underwriters"), to respond to Plaintiff Tangletown, LLC's ("Tangletown") motion to compel for approximately three (3) days, specifically extending Underwriters' deadline from February 12, 2007 to 5:00 PM on February 15, 2007. This extension is being requested because the parties have been involved in extensive settlement negotiations and are hopeful that a settlement will be executed so as to render Tangletown's motion to compel moot. In

STIPULATION TO EXTEND DEADLINE TO RESPOND TO
MOTION TO COMPEL – CASE NO. C06-0846 JCC - 1

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order to minimize litigation expenses in light of the possible settlement agreement, the parties stipulate to extend the deadline for Underwriters to respond to Tangletown's motion to compel to 5:00 PM on February 15, 2007.

II. STATEMENT OF FACTS AND ARGUMENT

On February 8, 2007, the parties attended mediation and, after concerted efforts by both sides, a preliminary settlement was reached but the specific terms of this settlement have not been finalized. The requested extension of time for Underwriters to respond to Tangletown's motion to compel from February 12, 2007 to 5:00 PM on February 15, 2007 will serve the interests of justice as it allows the parties to avoid incurring additional litigation expenses which could be unnecessary and undermine the finalizing of the preliminary settlement. The parties are hopeful that the requested extension for Underwriters to respond to Tangletown's motion to compel will provide sufficient time to allow the parties to reduce the preliminary settlement into a fully executed Mutual Release and Settlement Agreement, thus rendering the motion to compel moot and allowing for a complete dismissal of this action. Alternatively, should the parties be unsuccessful in executing a Mutual Release and Settlement Agreement, Underwriters' opposition will be due by 5:00 PM on February 15, 2007.

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STIPULATION TO EXTEND DEADLINE TO RESPOND TO
MOTION TO COMPEL – CASE NO. C06-0846 JCC - 2

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III. CONCLUSION

For the foregoing reasons, the parties respectfully request that the stipulated motion be granted and the time for Underwriters to respond to Tangletown's motion to compel be extended to 5:00 PM on February 15, 2007. All other case dates would remain the same.

DATED this 12th day of February, 2007.

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Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated this 13th day of February, 2007



UNITED STATES DISTRICT JUDGE
JOHN C. COUGHENOUR

STIPULATION TO EXTEND DEADLINE TO RESPOND TO
MOTION TO COMPEL – CASE NO. C06-0846 JCC - 3

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